

DOE Public Hearing on Draft EIS
Statham Hall, Lone Pine, California
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EIS000262

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*Submitted to
Court reports
lone pine, PM*

Comments by Michael Dorame, Supervisor, 5th District
Inyo County Board of Supervisors

On behalf of the Inyo County Board of Supervisors I would like to thank the Department of Energy for providing Inyo County and California with today's hearing. We hope your visit here is informative and productive for both DOE and residents of the region.

TRANSPORTATION COMPONENT OF EIS IS TOTALLY INADEQUATE

- 1 [The County's primary concern with the EIS is the superficial analysis of the transportation campaign necessary to move some 70,000 or more tons of radioactive waste into Yucca Mountain. In terms of ~~near~~^{short} term risk to humans, the hazards associated with transportation pose the greatest threat to populations across the nation.

The transportation campaign is an integral part of the Yucca Mountain project. It is inseparable from the operation of the proposed repository. Consideration, in detail, of transportation impacts cannot reasonably be deferred to future analysis any more than other off-site impacts.]

- 2 [Without detailed information on likely primary and secondary routes in California and the staging of shipments, it is impossible for Inyo County to evaluate the impacts of the shipping campaign on our area.

At present, State Route 127 is being utilized for shipment of low-level nuclear waste to the Nevada Test Site and may be used for shipment of transuranic waste from the Test Site to the Waste Isolation Pilot Plant. This makes State Route 127 a likely candidate for eventual shipments of high-level waste.

The Nuclear Waste Policy Act, Section 180(c) calls for Federal action to provide improvements in emergency response training and capability along routes designated for the transport of high-level nuclear waste and spent fuel. The virtual absence of emergency response capability on Route 127 and the isolated character and the current configuration of this roadway promise to make compliance with this part of the Act an involved and expensive exercise on the part of the Federal Government.

Other necessary improvements will include complete reconstruction of some sections of the roadway and the construction, equipping and staffing of emergency response stations. The County and the State will be saddled

with significant new costs to safeguard its residents. The EIS fails to address, in any manner, the significant fiscal and possibly significant environmental impacts of meeting these obligations. These impacts too, are inseparable from the issue of the repository itself and need to be quantified by the EIS.

CONDUCT A NATION-WIDE RISK COMPARISON OF ROUTING

- 3 [The EIS needs to include a risk analysis comparing, at a national level, all probable primary and secondary shipment routes coming into Yucca Mountain. Again, absent information on the range of impacts expected to accrue to the project, we, as citizens, and the Federal and State decisionmakers expected to use the EIS, are left without the tools to weigh risks, evaluate alternatives, or recognize what constitutes an unavoidable transportation impact.

Route choice will affect the safety, cost and timing of transport operations. DOE needs to engage in a comprehensive study of this issue in order to develop a scientifically defensible, least-risk-based determination of routes. Private carriers should not be burdened with the responsibility to evaluate and choose routes. The preferred corridors should be mapped by DOE and the required roadway and emergency response improvements identified. In this way, the total impact and cost of the project can be laid out for public review.

- 4 [As issued, the EIS treats the transportation campaign as a shadowy, vague topic. To readers of the EIS, it appears that DOE is deliberately avoiding the issue because it will no doubt generate a volatile, nation-wide response. We would submit, however, that there is little use in pursuing the repository until we have made a determination that the risks and costs associated with transporting the waste are less than those associated with leaving it where it is. These issues need to be settled to the satisfaction of the majority of the impacted population.]

PREFERENCE FOR RAIL-FOCUSED OPTION

- 5 Finally, [Inyo County has a strong preference for a rail-focused option which offloads the bulk of the waste east of the site. Lincoln County, Nevada has already indicated its support for an intermodal transfer site within its jurisdiction. Development of this site would avoid reliance on transportation corridors in high-risk areas south and west of Yucca Mountain and place one of the major components of the project in a jurisdiction amenable to the operation.]

CONCLUSION

- 6 To conclude, [we are of the opinion that the Environmental Impact Statement's superficial treatment of transportation is, regardless of other

considerations, sufficient to invalidate the EIS for purposes of evaluating the implications of operating the repository.

A transportation-focused supplement to the EIS should be developed which identifies specific routes and includes a comprehensive transportation risk analysis. Until such a supplement is available to the public, it will be impossible to evaluate any alternatives to the process. Until the document has been developed and exposed for public review, there is little point in proceeding with the current Environmental Impact Statement.